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October 18, 2016

***Via ECF***

Honorable Joel Schneider, U.S.M.J.  
United States District Court,  
District of New Jersey  
Mitchell H. Cohen U.S. Courthouse  
1 John F. Gerry Square  
Camden, New Jersey 08101

**Re: *In Re Riddell Concussion Reduction Litigation***  
**Civil Action No. 13-07585 (JBS) (JS)**

Dear Judge Schneider,

This letter is filed by Plaintiffs to request that Plaintiffs' Class Certification Deadline as set out in Doc. 173 be extended. Plaintiffs have conferred with Defendants and Defendants do not oppose Plaintiffs' request.

As Plaintiffs previously notified the Court, the second and final 30(b)(6) deposition of Defendants' representative, Allison Boersma, was scheduled to take place on Wednesday, October 12, 2016. However, on Sunday, October 9, 2016, Plaintiffs were notified that Ms. Boersma had a death in the family and would not be available that week. On Monday, October 10, 2016, Defense Counsel proposed November 3, 2016 as the next available date for the deposition of Allison Boersma.

For the same reasons set out in Plaintiffs' extension letter (Doc. 170), Plaintiffs will have to use this testimony to formulate their expert reports accompanying the Motion for Class Certification. As the new delay will hinder Plaintiffs' efforts to timely file the Motion for Class Certification, we are hereby requesting a reciprocal extension of time to file Plaintiffs' Motion for Class Certification in line with the delay of the remaining 30(b)(6) deposition. We request

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the Court extend the current deadline for Plaintiffs to file their Motion for Class Certification from November 15, 2016 to December 7, 2016.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO

*/s/ James E. Cecchi*

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JEC/ljt

cc: All Counsel of Record (via ECF)